

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

MARK SOKOLOW, et al.,

Plaintiffs,

Civ. No. 04-397 (GBD) (RLE)

v.

THE PALESTINE LIBERATION ORGANIZATION, et al.,

Defendants.

**SUPPLEMENTAL DECLARATION OF ROBERT J. TOLCHIN**

Robert J. Tolchin declares pursuant to 28 U.S.C. § 1746, as follows:

1. I am an attorney licensed to practice law in the State of New York and in this Court, and counsel for the Plaintiffs in the above-referenced action.

2. On May 3, 2012, counsel for the parties conferred by telephone. During that conference, plaintiffs' counsel informed defendants' counsel that plaintiffs were considering seeking to modify the existing discovery deadline in light of the fact that the deposition of Abdullah Barghouti, who is imprisoned in Israel, has been adjourned sine die because Mr. Barghouti is currently on a hunger strike. In response, defendants' counsel, Brian A. Hill, Esq., informed plaintiffs' counsel that he did not believe a modification of the discovery schedule is necessitated by Mr. Barghouti's hunger strike, because the discovery deadline is far in the future and adequate time remains for the hunger strike to conclude and the deposition to be taken.

3. Mr. Hill's aforementioned statement refutes defendants' claim in their opposition to plaintiffs' pending motions to issue Hague Convention requests for the depositions of persons imprisoned in Israel (DE 221-226), that the depositions sought cannot be completed prior to the discovery deadline, and shows that defendants' real goal is to keep this testimony out of the case.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

May 6, 2012

  
\_\_\_\_\_  
Robert J. Tolchin